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June 8, 2022

Hon. J. Paul Oetken United States District Judge Southern District of New York 500 Pearl Street New York, NY 10007

Re: United States v Nijmah Marte, 22 Cr. 293 (JPO)

Your Honor:

I represent Nijmah Marte in the referenced case and am submitting this letter to request permission a change in the conditions of Ms. Marte's bond. On March 23, 2022, pursuant to an agreement between the parties, Ms, Marte was released on the condition of home incarceration with electronic monitoring. The bond also specified she would reside at the home of her brother's girlfriend, thereby enabling her to earn money as a baby sitter for her relatives. Subsequently, the condition of home incarceration was changed to home detention at the suggestion of her pretrial officer, so that she could more easily attend various programs run by Exodus Transitional Inc. Since then, Ms. Marte has been attending various programs on essentially a full-time basis, making her too busy to act as a babysitter. Meanwhile, she remains fully compliant with her other conditions.

Recently, however, a conflict has arisen between Ms. Marte and her brother, who is frequently at the location where she now resides. Accordingly, we ask that she be permitted to reside at her mother's apartment, located at 564 West 188th Street, New York, NY. Her remaining conditions of home confinement with electronic monitoring would continue.

The government and pre-trial services consent to this application.

Respectfully submitted,
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/s/
James E. Neuman

J. PAUL OETKEN
United States District Judge